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Before the Federal Communications Commission  
Washington, D.C. 20554

In the matter of	)	
1998 Biennial Review	)	WT Docket 98-143
--Amendment of Part 97	)	RM-9148
of the Commission's	)	RM-9150
Amateur Service Rules.	)	RM-9196

### **Qualification to Comment**

Leonard J. Umina, K1LU, is an Extra Class Amateur Radio Operator holding Commercial Licenses and a BSEE from the University of Massachusetts. He is an active VE (ARRL) and has been active in Amateur Radio for over 30 years. He currently is the trustee of 4 Amateur Radio Repeaters and was the founder of the Marlboro Youth Repeater Association (MYRA, comments filed separately). Mr. Umina is a self made millionaire and has contributed extensive sums to the furtherence of Amateur Radio, especially in the young. During the past 24 months he has personally trained and assisted 15 people in obtaining their licenses, as young as 7 and as old as 70. He has participated in the examination of a far greater number through the MMRA examination activities and at the ARRL Boxboro convention in Massachusetts.

### **My comments on the proposal are as follows:**

1. Are six classes of licenses unnecessary?

All current classes are necessary, however the Novice Class of license should be modified as outlined below.

2. How important is the Novice Class?

The Novice Class is important as an entry point for HF radio. It is my belief that dual paths should exist for Technician and Novice interests. The Novice Class should be a precursor to upgrades expanding HF privileges, while the Technician Class license should be simplified and targeted at VHF/UHF operation.

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I have found, particularly since the recent Technician Class questions have been updated to enlarge the pool, that the exam is much more difficult than it should be since it contains the Novice exam as well. I believe the following changes should be made:

- a. Eliminate the Novice Exam for the Technician License.
- b. Provide Technician Class VHF/UHF privileges for all Novice operators.
- c. Expand Novice privileges to include SSB sub bands in the General Band Segments.
- d. The Novice Class License should expire in 5 years and be non renewable.

3. What should be the disposition of the Novice Bands?

The Novice Bands should remain unchanged, however SSB segments should be added within the General Class sub bands on 15, 40, 80, and 160 meters. Further, power limitations in the Novice bands should be eliminated.

4. Should the Technician Plus license be phased out?

Yes, if the above recommendations are implemented. The current holders of the Technician Plus License should receive a non-renewable Novice Class License as outlined above. This would give them their current privileges plus SSB privileges on the requested SSB Novice sub bands.

5. Should Advanced Class Operators be permitted to be VE's for the General Class?

No. There is no need for this and it would raise some security issues with regard to the examination material, as well as potentially cause problems during examinations. I have personally participated in examinations where my ability to copy code far in excess of those being tested was required to prevent disaster. Had this ability not been available, (and most Advanced Class amateurs can not pass the General CW exam) legal action or test cancellation might have resulted.

6. Should RACES station licenses be phased out.

Yes.

7. How can the Amateur Auxiliary improve enforcement of the Amateur Service rules?

The AA's ability to succeed depends in a large part on the willingness of the Amateur Community in general to respect and obey the laws. Very few Amateurs currently break the law, however demographic trends would indicate that this will shortly be very commonplace, especially if the efforts of the Commission succeed in expanding the number of licensed Amateurs.

In a recent survey, 82 percent of all students believe that right and wrong are relative terms and that morality is a "ridiculous concept". From these ranks will come the majority of new Amateurs.

The best method of promulgating lawful operation in the future might be to simply ensure that equipment is purchased only by licensed amateurs. This would help to prevent unlicensed operation.

8. What changes should be made to the telegraphy examination requirements.

Essentially none with regard to the existing license structure. By virtue of an expanded Novice Class License privilege set, as outlined above, we will be making a defacto change to the telegraphy requirement by allowing SSB operation on HF with only 5 wpm demonstrated capability. This level of change is enough. Any decrease in the requirement for Extra or General is unwarranted.

9. Should the code speed be reduced to 5 wpm for everyone as a way to eliminate the need to grant waivers of the higher code speed requirements for the handicapped?

No, and waivers should not be permitted for Extra Class privileges.

10. What changes, if any, should be made to the written examinations?

The Novice Class license material should be eliminated from the Technician Class license, as proposed above. The following changes should also be made:

- a. Eliminate all references to band limits for all license classes. A simple chart can supplant this memorization requirement and most require the chart 2 hours after the examination ends anyway. Memorization of frequency limits is a waste of valuable study time.
- b. Add material on Boolean Logic and computer programming to all license classes to recognize the important role computer technology now plays in communications.

### **General Additional Comments**

Certain demographic and societal trends, unpleasant as they may be, are changing our country and our American culture. These trends have effected Amateur Radio perhaps more than any action ever taken or contemplated by the FCC, the ARRL, or the majority of Amateurs. Licensing changes, while desirable, are no panacea for the ills which have befallen this technical hobby in an era where the average high school senior cannot pass a traditional 8<sup>th</sup> grade math exam. Right here in Massachusetts, our school teachers were tested and it was determined that 2/3 of them could not pass a high school test requiring 10<sup>th</sup> grade education.

In light of this, how can a technical hobby be expected to fare any better than it has over the past 20 years? In fact, I would say it has beaten the odds in general.

Other factors, such as the extremely high abortion rate among the upper middle class, where most people with the ability and resources to participate in Amateur Radio would normally be found, cannot be discounted as having a significant effect.

Finally, one must remember that HF operation, the primary incentive for upgrading, has been hampered over the past few years by the low sunspot activity as well as the commonplace restrictions on antenna construction now virtually covering all new construction in the United States. While an adult may have a choice to purchase older construction to avoid these restrictions, children typically do not, and action by the Commission on this issue is far overdue.

In recruiting and training almost two dozen new hams in the past two years, I have observed first hand what the competition to ham radio is for the minds of our young people. It is not the internet – in fact I wish it were – instead, it has proven to be something far less desirable in my experience – the addiction to videogames.

In every case I have encountered the internet has been a boon to Amateur Radio involvement. There are countless sites to assist the new devotee in the pursuit of the hobby, and many interesting areas of investigation. Not a single time has the internet caused me any recruitment competition.

Video games on the other hand have been a serious problem. They compete for time and attention with the same degree of devotion one observes with illicit drugs. Not only are they addicting they are far less additive to the overall experience needed to obtain an Amateur License, which one observes frequently with internet activity.

If you could only regulate video games you might cure many problems far beyond those currently under consideration.